

**IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA**

Alexandria Division

IN THE MATTER OF THE SEARCH OF A
U.S. POSTAL SERVICE PARCEL:
TRACKING NUMBER 9505 5114 5603 4142
1347 59 CURRENTLY LOCATED AT
DULLES PROCESSING AND
DISTRIBUTION CENTER AT 44715
PRENTICE DRIVE, DULLES, VIRGINIA
20101 IN THE EASTERN DISTRICT OF
VIRGINIA

Case No. 1:24-SW-381

**AFFIDAVIT IN SUPPORT OF APPLICATION
FOR A SEARCH WARRANT FOR ONE U.S. MAIL PARCEL**

I, Alexander Grant, being duly sworn, hereby depose and state:

INTRODUCTION AND AFFIANT BACKGROUND

1. I have been a U.S. Postal Inspector since August 2023. I have completed twelve weeks of investigator training at the Federal Law Enforcement Training Center's Criminal Investigator Training Program in Glynco, Georgia. I previously served as a deputy with the United States Marshals Service from July 2019 to August 2023, wherein I have experience investigating general crimes and enforcement operations. Prior to this, I was an officer with United States Customs and Border Protection for approximately three years, wherein I gained experience investigating and interdicting narcotic traffickers and illegal human smuggling at the U.S. port of entry, effecting arrests, and screening passengers and conveyances for safe entry into the United States. Throughout my nearly eight years in law enforcement, I have conducted and participated in investigations concerning currency proceeds from illegal narcotics sales, illegal importation of

narcotics, and the smuggling of clandestine substances. I have participated in seizures of narcotics, monies, weapons.

2. The facts and information contained in this affidavit are based on my training and experience, personal knowledge, and observations during this investigation, as well as information provided by other agents involved in this investigation. All observations that were not made personally by me were related to me by the persons who made the observations. Sources of information used routinely in this process include verifying zip codes through a public database maintained by the U.S. Postal Service (*USPS.com*) and checking associations between names and addresses in a law enforcement database (*CLEAR*). The data provided in *CLEAR* helps law enforcement to determine things such as, but not limited to: an individual's address(es), phone number(s), email address(es), criminal history, and vehicle registration(s). This affidavit contains only that information necessary to establish probable cause in support of an application for the requested search warrant. This affidavit is not intended to include each and every fact and matter observed by or made known to agents of the government.

SUBJECT PARCEL

3. This Affidavit is submitted in support of an Application for a Search Warrant for one subject U.S. Mail Parcel, hereinafter "the Subject Parcel" (further described in Attachment A). The Subject Parcel is currently located at the U.S. Postal Service, Dulles Processing and Distribution Center, 44715 Prentice Drive, Dulles, Virginia, 20101, which is located within the Eastern District of Virginia. I submit that the facts alleged herein provide probable cause to believe that a search of the Subject Parcel will yield evidence, fruits, and/or instrumentalities of violations of Title 21, United States Code, Sections 841(a)(1) and 846, relating to the distribution of

controlled substances. I therefore request authority to search the Subject Parcel for the items described in Attachment B.

4. The Subject Parcel is identified as follows:¹

<i>Subject Parcel</i>	<i>Express (E), Priority (P), First Class (F), or Registered (R) Tracking ID Number</i>	<i>From: Name and Address</i>	<i>To: Name and Address</i>	<i>Current Parcel Location</i>
1	(P) 9505 5114 5603 4142 1347 59	3516 lakeside Irving TX 75061	14944 vireo ct Woodbridge va 22193	Dulles Processing and Distribution Center in Dulles, VA, located in the Eastern District of Virginia

BACKGROUND ON FACTORS INDICATING CONTRABAND

5. Based upon my training and experience, I know that there are suspicious characteristics common to many packages that contain narcotics, controlled substances or narcotics proceeds (currency), and personal and financial documents related to such proceeds and narcotics. These factors, detailed more fully below, are used as a pointer system to identify packages requiring further investigation.

6. The Subject Parcel exhibited several of these factors and was also alerted to by a trained canine. While there are many characteristics that experienced Postal Inspectors look for, the most common factors or suspicious characteristics routinely observed in the course of screening packages are as follows:

¹ For all of the tables in this Affidavit regarding the Subject Parcel, I have listed the sender and recipient information as it appears on the Subject Parcel. In other words, the capitalization, punctuation, and spelling of addresses in the table are the same as that which I observed on the Subject Parcel.

7. Contrasts observed between Legitimate Business Parcels and Drug Parcels:

As alternatives to First-Class Mail, which does not always provide a customer with the ability to track the progress of a parcel through the system, the U.S. Postal Service offers Priority Mail Express and Priority Mail.

- a. Priority Mail Express: Priority Mail Express is guaranteed to be delivered on a set date and time, usually overnight (the deadline is determined at the time of mailing). The customer receives a receipt with this guaranteed information and can opt for a signature requirement when the parcel is delivered. Customers can track the parcel online by its distinct Priority Mail Express tracking number. The weight of the package and the distance traveled are the two main factors in setting the price. Priority Mail Express costs more than Priority Mail. Businesses using Priority Mail Express typically have a business or corporate account visible on the mailing label, which covers the cost of the mailing, in contrast to the drug distributor who will pay at the counter with cash or a credit card.
- b. Priority Mail: Priority Mail has a delivery service standard of two to four business days, but it is not guaranteed. Priority Mail is a less expensive alternative to Priority Mail Express, but still provides the ability to track a parcel. Business Priority Mail Express parcels typically weigh no more than eight ounces, and business Priority Mail parcels typically weigh no more than two pounds. Drug packages typically exceed these weights; in my experience, it is fairly easy to separate out smaller parcels, which constitute seventy to eighty percent of all Priority Mail Express and Priority Mail parcels, from other

parcels. Address labels on business parcels are typically typed, and address labels on drug packages are typically handwritten. Typically, drug traffickers using Priority Mail Express will opt out of the signature requirement.

c. First-Class Mail: Some individuals mailing illicit narcotics through the U.S. Postal Service are now utilizing both First-Class package service with tracking, and First-Class mail without tracking, as a way to obscure their illicit activity and to circumvent law enforcement profiling efforts. First-Class packages containing illicit narcotics may weigh less than one pound, or even be mailed in flat envelopes, depending on the type of narcotic involved.

8. **Invalid Sender/Return Address:** When drugs are shipped through the mails, the senders generally do not want them back. To distance themselves from parcels containing drugs, the return addresses and the names of senders are often fictitious or false. A fictitious or false address can be anything from an incorrect zip code to a non-existent house number or street. The name of the sender is also typically invalid: I have seen packages sent by persons with names of celebrities, cartoon characters, or fictional persona, but more often a search of the *CLEAR* database reflects that there is no association between the name of the sender and the address provided.

9. **Invalid Recipient/Address:** It may appear counter-productive to put the wrong receiving address on a package, but often the named recipient is not associated with the address. This provides plausible deniability to anyone receiving the package as to their knowledge of its contents. Sometimes drug packages are addressed to vacant properties with the expectation that the postal carrier will just leave it at the address. The intended recipient will then retrieve it from that location and hope to remain anonymous.

10. **Destination State:** If other criteria are present, I know from experience and training that a domestic package addressed to a source narcotics state, which is a state where narcotics often originate, can further indicate that a parcel contains proceeds from the sale of illegal narcotics and/or illegal narcotics.

11. **State of Origin:** If other criteria are present, I know from experience and training that a domestic package sent from a source narcotics state, which is a state where narcotics often originate, can further indicate that a parcel contains controlled substances. The Subject Parcel originates in Texas, where narcotics trafficking is more prevalent.

12. **Electronic Postage:** The U.S. Postal Service created electronic postage as a service for frequent mailers and businesses who prefer printing address labels and purchasing postage from their residence or business. In my training and experience, drug traffickers may sometimes create electronic postage accounts as a means of giving legitimate appearance to their drug mailings. In these cases, they typically create the accounts using fictitious account information and often provide pre-paid credit cards as a means of payment, which are difficult to track. Drug traffickers often use legitimate business return addresses in states other than California and Arizona and other known “source” states as a means to deter detection, as these other states are not usually considered “source” states for controlled substances. The postage labels are printed/typed unlike the typical drug related mailing label, which is routinely handwritten.

13. **Additional Factors:** Additional factors seen less frequently, but nevertheless noteworthy, include:

- a. **Smell:** The odors of cocaine, marijuana, and methamphetamine are distinct, and, through experience, Postal Inspectors are familiar with these odors. On occasion, a parcel will emit an odor that is easily recognized without the

assistance of a canine. Other smells that suggest the contents are narcotics are from masking agents. Common masking agents used in an attempt to thwart law enforcement and canines typically include dryer sheets, coffee, mustard, and any other substance that releases a strong smell.

b. Packaging: Heavily taped parcels are another factor that will suggest a drug parcel. I have also observed excessive glue on package flaps.

14. It is my experience that when a combination of the factors outlined above are observed, a drug detection canine will likely “alert” next to the parcel, indicating the dog has detected the odor of narcotics.

PROBABLE CAUSE

15. On May 21, 2024, the Subject Parcel was mailed from the Irving Main Post Office, 2701 W Irving Blvd Irving, Texas 75061. On May 22, 2024, the Subject Parcel was intercepted in the Eastern District of Virginia from the USPS Dulles Processing and Distribution Center, 44715 Prentice Drive, Dulles, Virginia 20101. Your affiant placed the Subject Parcel in holding at the USPIS Dulles Domicile in the Dulles Processing and Distribution Center.

16. As listed in the table below, the Subject Parcel has the following characteristics that gave rise to suspicion of drug distribution, as discussed more fully in paragraphs 17-19.

Subject Parcel	
Priority Express/Priority/Registered/1 st Class	(P)- 9505 5114 5603 4142 1347 59 DIMENSIONS 8.25" x 6" x 1"
Weight of Parcel	3.0 ounces
Shipping Label	HANDWRITTEN
Sender Name/Address Associated	SEE PARAGRAPH 17- No name to associate

Recipient Name/Address Associated	SEE PARAGRAPH 18- No name to associate
Signature Requirement	N/A
Source Area	Yes, Texas
Other Suspicious Characteristics	SEE PARAGRAPH 19

17. Your affiant reviewed records from CLEAR to conduct a check of the sender address listed on the Subject Parcel, to wit, "3516 lakeside Irving TX 75061." Your affiant determined the address is a valid address. However, no name was listed to associate with the listed address. By failing to enter a name on the USPS shipping label, criminals endeavor to protect and shield their identity, and avoid detection by law enforcement.

18. Your affiant reviewed records from CLEAR to conduct a check of the recipient address listed for the Subject Parcel, to wit, "14944 vireo ct woodbridge va 22193." Your affiant determined the address is a valid address. However, no name was listed to associate with the listed address. The entry of an incomplete address and failure to use a recipient name on the shipping label provides the true intended recipient with plausible deniability should they be confronted by law enforcement.

19. In sum, the Subject Parcel: (1) postage was paid for in cash in the amount of \$11.60; and (2) no names were listed for the both the sender and recipient address to associate to the addresses.

20. Based on the suspicious characteristics described above, this package was presented to a trained police canine for examination on May 22, 2024. Canine Mae and his handler, Fairfax Police Detective Peter Marcotte, were utilized in an attempt to determine whether the

Subject Parcel contained illegal narcotics. Standard protocols for canine detection were followed using Canine Mae. Canine Mae was last certified on January 2023, to alert on the odors of cocaine, crack cocaine, heroin, black tar heroin, methamphetamine, and MDMA (ecstasy). Canine Mae is trained regularly to ensure the canine's accuracy in the detection of drug odors.

21. The Subject Parcel was placed among other USPS Mail outside in the parking lot at the USPS Dulles Processing and Distribution Center, in Dulles, Virginia. At that time, Fairfax Police Detective P. Marcotte and Canine Mae were brought in to search the area. The handler observed Canine Mae and then informed U.S. Postal Inspectors that the dog alerted on the Subject Parcel, which was hidden arbitrarily among other USPS Parcels.

CONCLUSION

20. I submit that, based upon the above indicators exhibited by the Subject Parcel, and Canine Mae's positive indication, as well as my training, experience, and historically seized shipments, there is probable cause to believe that the above-described Subject Parcel contains narcotics or controlled substances and/or materials relating to the distribution of controlled substances through the United States Mail. Therefore, I respectfully request that this Court issue a search warrant for the Subject Parcel, as described in Attachment A, authorizing the seizure of the items described in Attachment B.

Alexander B. Grant

Alexander Grant
United States Postal Inspector

Attested to in accordance with the requirements of
Fed. R. Crim. P. 4.1 via telephone on May 23, 2024:

The Honorable Lindsey R. Vaala
United States Magistrate Judge
Alexandria, Virginia

ATTACHMENT A

DESCRIPTION OF PARCELS TO BE SEARCHED

<i>Subject Parcel</i>	<i>Express (E), Priority (P), First Class (F), or Registered (R) Tracking ID Number</i>	<i>From: Name and Address</i>	<i>To: Name and Address</i>	<i>Current Parcel Location</i>
1	(P) 9505 5114 5603 4142 1347 59	3516 lakeside Irving TX 75061	14944 vireo ct Woodbridge va 22193	Dulles Processing and Distribution Center in Dulles, VA, located in the Eastern District of Virginia

ATTACHMENT B

DESCRIPTION OF ITEMS TO BE SEIZED

1. Narcotics or other controlled substances, as well as contraband related to drug trafficking,
e.g., packaging materials;
2. United States currency or other financial instruments that appear to be proceeds related to
the distribution or purchase of illegal narcotics;
3. Customer records related to drug trafficking;
4. Business ledgers, lists, and notations relating to drug trafficking;
5. Prescription records;
6. Records of a financial nature that suggest how payment for illegal narcotics is conducted;
and
7. Other evidence of transactions in relation to drug trafficking.